

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

MAMIE MADDOX,

Plaintiff,

v

AMERICA'S SERVICING CO., et al.

Defendants.

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**CIVIL ACTION NO.:
CV: 09-CO-1099-w**

**MOTION TO REMAND FOR FAILURE
TO REMOVE WITHIN 30- DAY TIME LIMIT**

Plaintiff moves this Honorable Court to remand this matter to the Circuit Court of Tuscaloosa County, Alabama and as grounds for said motion states the following:

1. That Defendant, America's Servicing Co., was served in the Circuit Court of Tuscaloosa County with a copy of this Complaint on April 4, 2009. See Exhibit A.
2. That the Defendant filed a Notice of Removal with this Court on June 2, 2009.
3. That more than 30 days had elapsed before the Defendant filed its Notice of Removal.

WHEREFORE, the Plaintiff requests this Court to remand this matter to the Circuit Court of Tuscaloosa County, Alabama.

Respectfully submitted this the 12th day of June, 2009.

/s/Dennis Steverson

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CERTIFICATE OF SERVICE

I hereby certify that on June 12th, 2009, the foregoing has been served on the following by electronic filing:

Attorney D. Keith Andress
Attorney Catherine Long
Baker, Donelson, Bearman,
Caldwell & Berkowitz, PC
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Birmingham, AL 35203

/s/Dennis Steverson

Dennis Steverson